

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652
23 2950 E. Flamingo Road, Suite L
24 Las Vegas, Nevada 89121

25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 US BANK, NATIONAL ASSOCIATION,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC., et al.,

Defendants.

Case No.: 2:21-CV-01186-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF Nos. 21, 32)**

THIRD REQUEST

COMES NOW defendant Chicago Title Insurance Company (“Chicago Title”) and
plaintiff U.S. Bank, National Association (“U.S. Bank”), by and through their respective attorneys
of record, which hereby agree and stipulate as follows:

1. On June 21, 2021 U.S. Bank filed its complaint in the Eighth Judicial District
Court for the State of Nevada;

1 2. On June 22, 2021, Chicago Title removed the instant case to the United States
2 District Court for the State of Nevada (ECF No. 1);

3 3. On August 30, 2021, Chicago Title filed its motion to dismiss U.S. Bank's
4 complaint (ECF No. 21);

5 4. On October 13, 2021, U.S. Bank filed its opposition to Chicago Title's motion to
6 dismiss (ECF No. 31) and filed a countermotion for partial summary judgment (ECF No. 32);

7 5. On October 22, 2021, the Court granted the parties' first stipulation extending the
8 time for Chicago Title to reply in support of its motion to dismiss and to oppose the
9 countermotion for partial summary judgment through and including December 3, 2021 (ECF No.
10 38);

11 6. On December 1, 2021, the Court granted the parties' second stipulation extending
12 the time for Chicago Title to reply in support of its motion to dismiss and to oppose the
13 countermotion for partial summary judgment through and including December 10, 2021 (ECF No.
14 43);

15 7. Counsel for Chicago Title request a 31-day extension of time for Chicago Title to
16 file its opposition to U.S. Bank's countermotion for partial summary judgment and to reply in
17 support of its motion to dismiss, such that both shall be due on Monday, January 10, 2022, to
18 afford Chicago Title's counsel additional time to review and respond to the arguments in U.S.
19 Bank's opposition and countermotion.

20 8. Counsel for U.S. Bank does not oppose the requested extension;

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1 9. This is the third request for an extension made by counsel for Chicago Title, which
2 is made in good faith and not for the purposes of delay.

3 **IT IS SO STIPULATED** that Chicago Title's deadlines to reply in support of its motion
4 to dismiss and oppose U.S. Bank's counter motion for partial summary judgment are hereby
5 extended through and including Monday, January 10, 2022.

6 Dated: December 8, 2021

SINCLAIR BRAUN LLP

8 By: /s/-Kevin S. Sinclair
9 KEVIN S. SINCLAIR
10 Attorneys for Defendants
CHICAGO TITLE INSURANCE COMPANY

11 Dated: December 8, 2021

WRIGHT FINLAY & ZAK, LLP

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13 By: /s/-Lindsay D. Dragon
14 LINDSAY D. DRAGON
Attorneys for Plaintiff
U.S. BANK, NATIONAL ASSOCIATION

15 **IT IS SO ORDERED.**

16 Dated this 9th day of December, 2021.

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19 ANDREW P. GORDON
20 UNITED STATES DISTRICT JUDGE
21 2:21-CV-01186-APG-BNW
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